

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re EDAP TMS S.A. Securities Litigation

THIS DOCUMENT RELATES TO:
ALL ACTIONS

No. 1:14-cv-06069-LGS

CLASS ACTION

ORAL ARGUMENT
REQUESTED

**DEFENDANTS EDAP TMS S.A. AND MARC OCZACHOWSKI'S
MOTION TO DISMISS AMENDED COMPLAINT**

Pursuant to Federal Rules of Civil Procedure 12(b)(6), 8, 9(b) and the Private Securities Litigation Reform Act, 15 U.S.C. § 78u-4(b)(2), EDAP TMS S.A. ("EDAP") and Marc Oczachowski (together with EDAP, "defendants") hereby move to dismiss this putative class action in its entirety. The grounds for this motion are explained in detail in the accompanying Memorandum of Law. Defendants also request oral argument on this motion.

WHEREFORE, the defendants respectfully request that the Court dismiss this action in its entirety with prejudice.

Dated: February 20, 2015

Respectfully submitted,

/s/ Michael G. Bongiorno
Michael G. Bongiorno
Peter A. Spaeth (admitted pro hac vice)
Andrew S. Dulberg (admitted pro hac vice)
Wilmer Cutler Pickering Hale and Dorr LLP
7 World Trade Center
250 Greenwich Street
New York, NY 10007
(212) 230-8800 (t)

(212) 230-8888 (f)
michael.bongiorno@wilmerhale.com

*Attorneys for EDAP TMS S.A. and Marc
Oczachowski*

CERTIFICATION

I hereby certify that on February 20, 2015, a copy of foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing. Parties may access this filing through the Court's system.

/s/ Andrew S. Dulberg

Andrew S. Dulberg
WILMER CUTLER PICKERING HALE & DORR LLP
60 State Street
Boston, MA 02109
617 526-6000 (t)
617 526-5000 (f)
andrew.dulberg@wilmerhale.com